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October 26, 2001

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
455 12th Street, S.W. - Portals  
Washington, DC 20554

*RE: Bell Atlantic Corp. and GTE Corp., CC Docket No. 98-184*

Dear Ms. Salas:

The attached letter was provided to D. Attwood today. If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in cursive script that reads "Dee May" followed by a stylized monogram or set of initials.

cc: M. Stone  
A. Dale  
C. Matthey

Dee May  
Assistant Vice President  
Federal Regulatory



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October 26, 2001

Dorothy Attwood  
Chief – Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Ms. Attwood:

In its Order released September 26, 2001,<sup>1</sup> the Commission directed Verizon to propose “new performance standards for the affected measurements [under the Bell Atlantic/GTE merger Carrier-to-Carrier Performance Assurance Plan] within 30 days” of the Order’s release. Two measurements require new performance standards:

- PR-4-05 (% Missed Appointment – Bell Atlantic – No Dispatch) for Line Sharing in the former Bell Atlantic service areas;
- PR-4-05 (% Missed Appointment No Dispatch) for Line Sharing in the former GTE service areas.

For the former Bell Atlantic service areas, the current standard is “Where the SDA is using line sharing, for PR-4-05 Line Share – Parity with SDA [separate data affiliate].” For the former GTE service areas, the current standard is “For 2 wire xDSL, Where the SDA is using line sharing – Parity with SDA.” Verizon is proposing revisions to these standards to indicate that the standard will be parity with the SDA or separate office or division providing xDSL, as applicable. In addition, for the former Bell Atlantic service areas, the proposed standard for New Jersey is parity with retail “Infospeed.” Attachment A to this letter displays, in red-line format, the changes Verizon is proposing for the Guidelines currently in effect. Attachment B displays the changes that would need to be made assuming the changes in the most recently submitted redline version of these Guidelines (which were proposed by Verizon at the July 24, 2001 semi-annual review) have been accepted.

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<sup>1</sup> *Application of GTE Corp. and Bell Atlantic Corp. for Consent to Transfer Controls*, CC Docket No. 98-184, Order (rel. Sept. 26, 2001).

Verizon is still in the process of evaluating and planning the changes to methods, procedures, and systems that may be required to report the measures in the Carrier-to-Carrier Performance Assurance Plan where VADI is reintegrated. As a result of that ongoing process, and of our review of both the current and red-lined Guidelines, Verizon believes that other changes to the Guidelines, beyond the need for new standards, will be necessary to reflect the effects of reintegration where it occurs. We are continuing our efforts to identify all necessary changes.

If you have any questions, please do not hesitate to call me.

Sincerely,

*See May/AB*

Attachment

cc: A. Dale  
C. Matthey  
M. Stone

## **ATTACHMENT A**

### **Proposed Changes Performance Standards in Current Guidelines**

**PR-4 Missed Appointments (fBA)  
PR-4 Missed Due Dates (fGTE)**

## Current Performance Standards

### PR-4 Missed Appointments (fBA)

#### Performance Standard:

Parity with BA Retail

Note: Where the SDA is using line sharing, for PR-4-05 Line Share – Parity with SDA Retail Comparison for IOF and EEL is total Retail Specials

LNP: 95% on Time

Retail Comparison for 2 Wire DSL and 2 Wire Digital is POTS Second Lines

DSL Line Sharing: parity with separate data affiliate

### PR-4 Missed Due Dates (fGTE)

#### Performance Standard:

Parity with GTE Retail except for xDSL and line sharing which is compared to the separate data affiliate when established

Note: Where the SDA is using line sharing, for PR-4-05 Line Share – Parity with SDA

LNP: 95% on Time

## Proposed Performance Standards

### PR-4 Missed Appointments (fBA)

#### Performance Standard:

Parity with BA Retail

Note: Where the SDA or separate office or division providing DSL is using line sharing, for PR-4-05 Line Share – Parity with provision of Line Sharing to SDA or separate office or division providing DSL as applicable. NJ: parity with retail “Infospeed” (DSL Services)

Retail Comparison for IOF and EEL is total Retail Specials

LNP: 95% on Time

Retail Comparison for 2 Wire DSL and 2 Wire Digital is POTS Second Lines

DSL Line Sharing: parity with separate data affiliate

### PR-4 Missed Due Dates (fGTE)

#### Performance Standard:

Parity with GTE Retail except for xDSL and line sharing which is compared to the separate data affiliate when established

Note: Where the SDA or separate office or division providing DSL is using line sharing, for PR-4-05 Line Share – Parity with provision of Line Sharing to SDA or separate office or division providing DSL as applicable.

LNP: 95% on Time

## **ATTACHMENT B**

### **Proposed Changes Performance Standards in Redline Guidelines (7/24/01 semi annual review)**

**PR-4 Missed Appointments (fBA)  
PR-4 Missed Due Dates (fGTE)**

## Redline Performance Standards

### PR-4 Missed Appointments (fBA)

#### Performance Standard:

Parity with Verizon Retail

Note: Where the SDA is using line sharing, for PR-4-05 Line Share – Parity with SDA Retail Comparison for IOF is Retail DS3 and for EEL is Retail DS1 (Except for PR-4-02 where comparison is total specials)

LNP: 95% on Time

PR-4-14: 2 Wire xDSL Loops: 95% on Time

Retail comparison for PR-4-02 xDSL loops is retail specials DS0

### PR-4 Missed Due Dates (fGTE):

#### Performance Standard:

Parity with Verizon Retail except for xDSL and line sharing which is compared to the separate data affiliate when established

For 2 wire xDSL Loop, the retail comparison is Verizon ISDN BRI.

## Proposed Performance Standards

### PR-4 Missed Appointments (fBA)

#### Performance Standard:

Parity with Verizon Retail

Note: Where the SDA or separate office or division providing DSL is using line sharing, for PR-4-05 Line Share – Parity with provision of Line Sharing to SDA or separate office or division providing DSL as applicable. NJ: parity with retail “Infospeed” (DSL service).

Retail Comparison for IOF is Retail DS3 and for EEL is Retail DS1 (Except for PR-4-02 where comparison is total specials)

LNP: 95% on Time

PR-4-14: 2 Wire xDSL Loops: 95% on Time

Retail comparison for PR-4-02 xDSL loops is retail specials DS0

### PR-4 Missed Due Dates (fGTE)

#### Performance Standard:

Parity with Verizon Retail except for xDSL and line sharing which is compared to the separate data affiliate when established

Note: Where the SDA or separate office or division providing DSL is using line sharing, for PR-4-05 Line Share – Parity with provision of Line Sharing to SDA or separate office or division providing DSL as applicable.

For 2 wire xDSL Loop the retail comparison is Verizon ISDN BRI.